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14 Sep 2018  
DPTI

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████████████████████  
Mob: ██████████  
Phone: ██████████ (UniSA)

14 September 2018

Dear DPTI Planning Engagement

**Re: Comment on State Planning Policies**

I am pleased to make a formal submission concerning the draft State Planning Policies, as follow up to my online discussion post. I have a background in Architecture and urban/infrastructure planning, am a former adviser to the UN on eco-efficient, sustainable and inclusive urban development, chair of Ecological Development Union International Inc, and am a former employee of SA Government- including DPTI, Building Management, and Office for Major Projects and Infrastructure.

I also have a number of publications related to resource efficient buildings, infrastructure and urban development, am completing a book on 'Overbuilding', lead an ARUP Global Research Challenge Project to adapt the circular economy to the built environment, and hold the adjunct position of Associate Professor at UniSA.

The recent approval, by The State Commission Panel, of a procession of 'over the top' high rise buildings in our CBD, shows that current Planning Policies and approval processes are grossly inadequate. It makes no sense, according to a number of criteria, for these to be given the nod of approval when the amount of vacant space is also at sky-high levels - around 340,000 sq m (around 10-11 Adelaide Ovals).

I therefore respectfully request that consideration be given to the following changes and additions to the proposed Policies:

**POLICY 5: CLIMATE CHANGE**

1. Carbon-efficient living environments are not only more compact, but also meet community demands with less consumption of material and other resources. Climate change mitigation involves more than reducing operational emissions - it also must involve reducing embodied emissions and embodied carbon, which constitutes up to 40% of total carbon emissions. This seems to be largely overlooked by State Government and ACC Policies in our aspiration to be 'carbon neutral'.
  
2. So 'climate-smart buildings' must also reduce our demand for (and consumption of) water, energy AND MATERIALS.

**POLICY 3: ADAPTIVE REUSE**

Adaptation and reuse of existing buildings and infrastructure will save on embodied carbon associated with new construction. That is, it will make use of 'sunk carbon' that has already been 'spent' in the original construction of those structures. Even though new buildings may be somewhat more energy

efficient, this is usually outweighed by the embodied carbon, when the 'whole of life' carbon is considered.

Besides the imperative to reduce carbon emissions, construction of new buildings normally consumes much more scarce resources than refurbishment. This seems to be completely ignored by the proponents of extravagant new edifices, falsely claimed to be 'sustainable' - not to mention the inequity. Moreover, new construction in times of saturated/low demand may displace existing buildings, which become vacant, withdrawn from the market, and eventually end up as WASTE. A huge amount of waste and decay!

So I respectfully request that these considerations be mentioned under this policy and elsewhere.

#### PLANNING POLICY 2: DESIGN QUALITY.

The above points also impact upon this policy, including Sustainability and Durability. It is NOT environmentally responsible to consume planetary resources in a profligate, extravagant manner, especially when the built environment consumes about 40% of the earth's resources and creates 40% of waste.

How many of the recently approved hotels, apartments and offices are designed with consideration to possible future changes in the service/user requirements over their life? For example, conversion of over-supplied offices to residential or other use.

'Adaptable' and 'long-lasting' are fine objectives, but may be contradictory. There are ways to overcome this by designing the shorter-life parts of buildings (e.g. fit-out and even facades) for ease of replacement, within the longer-life shell or structural skeleton. But the Policy as it stands is far too vague, it needs to have more teeth. Also, terms such as 'good design' and 'high-quality' have too many different interpretations and should be avoided.

I trust you find my brief comments to be constructive. Please note that these are my own views, and do not necessarily represent those of UniSA.

If required, I should be pleased to assist further, such as by elaborating on the points made above, as the new policies are developed.

Kind regards

A handwritten signature in blue ink, appearing to read 'David Ness', written in a cursive style.

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